



**2018 Five-year Consolidated Plan
2018 – 2019 Annual Action Plan:
Summary of Public Comments**

The following a summary of comments received through the public comment period specific to the 2018 Consolidated Plan, the 2018 – 2019 Annual Action Plan, and the Analysis of the Impediments to Fair Housing. The department of Housing and Community Development (DHCD) gathered public comments through a series of input sessions, through an online portal, and through mail.

Written Comment	DHCD Response
<p>Northern Neck Planning District Commission: In rural coastal Virginia, there is an overwhelming need to address failed or failing residential well and septic systems. As an administrator of a septic pump-out program, we encounter and document hundreds of cases where septic repair or replacement is necessary. We receive calls from across our region from households whose wells have dried up. In assessing housing need in rural coastal Virginia, it is impossible to ignore these most basic amenities. In this region of Virginia, it is not just of concern for housing, but also for water quality and the health of the Chesapeake Bay Watershed. However, it is of primary concern to public health. I propose that the agencies tasked with health, housing and water quality combine efforts to address this great need. The Consolidated Plan should outline recommendations to address rural residential well and septic need and call for inter-agency collaboration.</p>	<p>DHCD continues to address rural residential well and septic system needs with our Indoor Plumbing Program, and in CDBG funded housing rehabilitation projects.</p>
<p>Endeppendence Center, Inc. Norfolk, VA: As a Center for Independent Living, a disability advocacy organization, serving Southampton Roads, including Western Tidewater area, we would like to submit the following comments on the 2018 5-year draft DHCD plan. Regarding the Fair Housing Analysis of Impediments, among the percentage of renters and homeowners who are cost-burdened, we would like to recommend the plan to include data on the percentage of households with disabilities. As a possible impediment, has the state considered including an assessment on the extent of local inspection and building code officials not citing violations of inaccessibility among covered multi-family</p>	<p>Include percentage of disabled householders who are cost-burdened: Data is not readily available for cost-burdened households by disability status. DHCD will continue to assess future availability of this data set.</p> <p>To what degree are local inspectors monitoring accessibility compliance with applicable multiple family projects (planning, construction, completion): DHCD requires that all new construction and substantial rehabilitation project meet minimum 504 standards and gives scoring preference for those projects that will exceed the minimum. While DHCD administers the state fire and building codes, it does not have jurisdiction over local inspector.</p>

<p>housing developments during planning and development phases?</p> <p>For the needs assessment, when providing data on the percentage of households - renters and homeowners- with severe cost-burden and substandard housing -- we would like to recommend to include data on the percentage of households with a mobility and self-care disability.</p> <p>For public and assisted housing market analysis, we would like to recommend that the plan include HUD data on the number of accessible units across public housing and private, assisted housing developments -- to assess whether these providers are meeting the minimum federal requirements for the percentage of accessible units.</p> <p>Due to the need of low-income home owners with disabilities in need of making accessibility modifications, we would recommend that the state to ensure that there are adequate emergency home repair and rehabilitation funds allocated to administering non-profits and local government agencies to meet wait listed and current housing needs.</p>	<p>DHCD will update the Analysis of Fair Housing to include, where available, more data specific to households with disabilities.</p> <p>Annually DHCD expends all funds available for emergency home repairs and accessibility modification. There continues to be a significant unmet need. DHCD welcomes any opportunities to increase available funding.</p>
<p>LifeLines Ministries Inc: When looking at housing please consider those who are members of underserved populations who are below the median income in there localities but earn too much for TANF assistance therefore won't qualify income eligible housing. They may be elderly and single Moms and or victims of violent crime.</p>	<p>DHCD will continue to offer a number of program resources to support affordable housing opportunities at 30, 50, 60, and 80 percent area median income.</p>
<p>Quinn Rivers Inc.: As we strive to serve the residents of the Northern Neck & Middle Peninsula area it is critical that funding opportunities are available to meet the ever growing need of affordable housing, emergency housing assistance and supportive services for our residents. Without the funding streams made available through federal sources, our state would not be able to serve those who are in the greatest need. The quality of life of our</p>	<p>DHCD will continue to serve the needs of the Northern Neck and Middle Peninsula through its programs that help address affordable housing and community development needs including those to address homelessness.</p>

communities rely heavily on the support of federal funding.	
<p>County of Patrick:</p> <p>1). Meadows of Dan- Grant funding for a Visitor Center, trails, restrooms, music venue, side walks. 2). Stuart - Grant funding for studies/plans/revit for businesses that will fit and succeed in the downtown area, connecting uptown to downtown, branding the area with sidewalks to the school . 3). Willis Gap- Funding for the Willis Gap Community Center. 4). Meadows of Dan - Funding for Meadows of Dan Community Center.</p>	DHCD continues to support revitalization of downtown's and other business districts by funding planning grants and subsequent implementation grants.
<p>Albemarle County: I believe it is important for HUD and DHCD to continue efforts to enable broadband for lower income areas of the Commonwealth. Broadband access does improve a student's ability to learn. Broadband supports economic development. Broadband is a necessary tool for interacting with future employees, the government, and other citizens. Our focus should be to swing the Broadband pendulum more away from those that have and shift it to those who have not. I believe the HUD program and VATI programs can co-exist and work together to meet our broadband goals.</p>	DHCD continues to support communities with their installation and/or expansion of broadband accessibility. Communities will continue to receive notification of the availability of CDBG and VATI funding.
<p>Virginia Housing Alliance: Community Development Block Grant (CDBG): - Expansion of the scattered sites rural rehab program - Funds for development projects specifically with infrastructure needs - Continue to build local staff while further implementing capacity (rules and regs). - Additional funding for supportive services. Emergency Solutions Grant (ESG): - Provide quarterly trainings - Implement flexible guidelines - Provide clarification on the lead based paint documentation. (Example: When does the landlord need to sign?) - Keep VHSP and HTF applications separate. - Increase focus on/funding for street outreach activities. - Increase administration allocation - Increase technical assistance to shelters in their efforts to be "low barrier" (particularly with hard to serve/house chronic homeless). - Increase need</p>	<p>DHCD continues to manage the Rural Housing Rehabilitation Program. Currently, CDBG funds housing rehabilitation activities with defined project areas to maximize community impact.</p> <p>ESG and Virginia Homeless Solution Program: DHCD provides periodic trainings throughout each program year. In addition, DHCD provides technical assistance to providers and CoCs, including quarterly conversations that focuses on how CoCs and local planning groups are collaborating as a system. DHCD in partnership with the National Alliance to End Homelessness, and the Virginia Coalition to End Homelessness (now the Virginia Housing Alliance) and funded through the Freddie Mac Foundation provided a series of trainings and technical assistance</p>

<p>for PSHs. - Increase HUD HMI's limits- causes a lot of families to not qualify. - Increase technical assistance for RRH and PSH in rural areas. National Housing Trust Fund (NHTF): - Continued/expansion of funding - Greater clarity on what funds will be used for is needed. - Increased funding for challenging, but not chronically homeless. - Preserve limited dollars for housing production (capital) - Reduction grant applications separate. - Make application more closely timed with VHSP. HOME Investment Partnership Program (HOME): - Lack of funding or not enough funds to support all applicants that may be eligible - Give Tenant- Based Rental Assistance (TBRA) programs another look, especially tools to assess homelessness - Urban redevelopment/In-file (guideline slanted toward rural). - Greater flexibility; only CHDO's often use funds. HOPWA: - Cycling off old clients and allocating funds for new (more recently diagnosed) individuals - Increased case management support (Have a health agency figure out how to support high needs clients) - Limits to how long clients remain funded (Some clients have received funding for several years- Should they transition to PSH? - "Require" (the right word might be utilize or implement) housing first (Low barrier; No requirement in engagement in supportive services) - Alternative approach if program has people who qualify for HOPWA - Increased integration into CoC process.</p>	<p>focused on Housing First and rapid re-housing to all areas of the state.</p> <p>The VSHP guidelines allows for some flexibility at the local level, but DHCD has structured the guidelines to meet federal requirements.</p> <p>The lead-based paint documentation is a form that includes instructions. There is HUD training required of all staff performing lead inspections.</p> <p>The state HTF (Homeless Reduction Grants) has been included in the VHSP application effective for the current (2018 – 2019) application. DHCD based this change on input gathered statewide from numerous stakeholders. DHCD intends this change to improve overall coordination of the Homeless Reduction grants with VHSP.</p> <p>While outreach has been an allowable activity under “coordinated entry,” it is currently (2018 – 2019) a separate funding category to recognize the importance of outreach as an element of an effective emergency crisis response system.</p> <p>Virginia is responding to the need for Permanent Supportive Housing (PSH). This response includes an annual allocation of funds to increase the number of PSH units; scoring incentives to increase the number of units in development projects, and interagency collaboration targeted at address the service and housing needs of special needs population such as those with intellectual and developmental disabilities, individuals with serious mental illness, and chronically homeless persons.</p> <p>HUD income limits –DHCD follows federal eligibility requirements.</p> <p>HOME: DHCD will pilot a Tenant Based Rental Assistance program during the 2018 – 2019 program year. This program will focus on helping individuals who age out of the foster care system to obtain housing stability and improved outcomes.</p>
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	<p>HOME: Through the Affordable and Special Needs Housing (ASNH) Program, DHCD funds project statewide (in both rural and urban areas). Eligible projects include in-fill urban projects. The ASNH program allocates state and national trust funds and HOME. DHCD allocates all funds statewide, however DHCD gives scoring preference to projects located in HOME non-entitlement localities for allocation of HOME funds. Home entitlement localities received HOME funds directly from HUD.</p> <p>CHDO (HOME): HUD requires that DHCD expend 15 percent of HOME funds on CHDO (Community Housing Development Organization) projects. DHCD gives a scoring preference to CHDO for allocations of HOME funds during ASNH funding process. As a result, DHCD averages 15 – 18 percent of its annual HOME commitment to CHDO projects.</p> <p>HOPWA (Housing Opportunities for Persons with AIDS): DHCD administers the HOPWA allocation for the balance of state. It does not include the metropolitan areas of Richmond, Tidewater, and northern Virginia; they receive HOPWA allocations directly from HUD. No “unmet need” is found in the balance of state. Typically, a “moving on” strategy is not appropriate for HIV/AIDS program participants because their condition tends to deteriorate. HOPWA funding supports case management but sub grantees are encouraged to work closely with other providers/programs to ensure program participant needs, for housing and services, are met. DHCD’s HOPWA allocation for the upcoming year will increase by 13 percent. The funding may have increased to address the fact that those infected with HIV/AIDS are living longer.</p>
<p>Rush Homes: 1. I fully support the HOME funding proposed toward for affordable housing needs along with the HTF funding available. However, the non-homeless special needs funding level (\$1.925MM) is low given the need. My particular experience of our own waiting list of people with disabilities at over 500 indicates more of an issue that can be addressed by the funding amount.</p>	<p>Increase funding for non-homeless special needs: The allocation amounts covers the five-year and annual action for HUD funding only. Please note, other state resources support the production of special needs housing including annual allocation</p>

<p>That funding also includes Rapid Rehousing and TBRA further reducing its effectiveness. 2. I suggest, if at all possible, setting aside CHDO operating funds that are important for these mission-based entities for whom meeting the need is primary and sustainability is more difficult. The goals regarding housing and services can be most likely met by CHDO's; support with operating funds is extremely useful 3. The one year goals for housing as noted in table 195 on p. 177 include only 195 units for special needs. That is quite low given the immense need. My concern is that people with the prioritization of homeless and DD to such an extent that many with other types of disabilities who live next to homelessness have lower priorities to an extent that appropriate housing is not really possible except for a fortunate few. 4. Supporting RAD efforts to rehab public housing is critical given the backlog of capital repairs and deferred maintenance that remains unfunded. I encourage stronger language regard RAD and moving funding in support.</p>	<p>specifically for the development of permanent supportive housing units.</p> <p>A set aside for CHDO operating: DHCD has set aside HOME funds in that past for CHDO operating. Annually, DHCD assesses the need for CHDO operating assistance. DHCD did not identify a need for the 2018 – 2019 program year. State-certified CHDOs in need of operating assistance with development projects in the pipeline are encouraged to contact DHCD for future (2019 – 2020) CHDO operating assistance.</p> <p>Special needs goals too low: The goals covers the five-year and annual action for HUD funding only. Please note, other state resources support the production of special needs housing including an annual allocation specifically for the development of permanent supportive housing units.</p> <p>Support RAD efforts: DHCD has six funding commitments to RAD projects and anticipates additional commitments in the near future.</p>
<p>Virginia Supportive Housing: The need for permanent supportive housing still exists across the commonwealth.</p>	<p>DHCD currently prioritizes permanent supportive housing (PSH). DHCD allocates annually \$500,000 in state funds through the Affordable and Special Needs Housing (ASNH) program to support the creation of new PSH units. In addition to this set-aside specifically for PSH, the ASNH program gives scoring preferences for the allocation of ASNH HOME, State Housing Trust Funds, and National Housing Trust Funds to projects that include special needs targeting units –including those specifically designated as PSH.</p>
<p>Cumberland Plateau Planning District Commission: The Cumberland Plateau Planning Commission, through its 501 C (3) subsidiary, the Cumberland Plateau Company, has developed a robust fiber optic network in four Virginia Coalfield counties. This network of several hundred miles was funded through the U.S. Economic Development</p>	<p>DHCD continues to support communities with their installation and/or expansion of broadband accessibility. Communities will continue to receive notification of the availability of CDBG and VATI funding.</p>

<p>Administration, the Virginia Tobacco Commission and the Virginia Coalfield Economic Authority. It was confined to serving business, industry and institutional customers. At present, we serve about 1,000 customers. The goal is to extend fiber and wireless services throughout this large, mountainous region where population densities are low. Further challenges include losses in coal mining employment and the resultant loss in population. The plan is to employ fiber expansion and wireless technology to reach as much of the business and residential community as possible. Funding will be sought from all available public resources and match provided through CPC revenues as directed by our Board of Directors.</p>	
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